

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-31828

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES  
& TECHNICIANS, COMMUNICATIONS WORKERS OF  
AMERICAN, LOCAL 31, AFL-CIO,

And

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-33125  
(formerly 2-CA-36129)

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES  
& TECHNICIANS, COMMUNICATIONS WORKERS OF  
AMERICAN, LOCAL 11, AFL-CIO.

**CNN AMERICA, INC.'S RENEWED REQUEST FOR EXTENSION OF TIME TO FILE  
A BRIEF IN RESPONSE TO CROSS-EXCEPTIONS AND FOR AN ENLARGEMENT  
OF THE PAGE LIMIT**

Consistent with the Rules and Regulations of the National Labor Relations Board ("Board") and the prior decisions of the Executive Secretary and Assistant Executive Secretary in this case, Respondent, CNN America, Inc. ("CNN"), hereby respectfully requests an extension of time and an enlargement of the page limit for its brief in response to the cross-exceptions of the General Counsel. CNN asks for permission to file, on or before Monday, May 18, 2009, a brief in response to the General Counsel's cross-exceptions of no more than 100 letter-sized, double-spaced pages together with an appendix of no more than 30 single-spaced 11-by-14 pages, or the equivalent (39 single-spaced 8.5-by-14 pages). Also, CNN requests an extension of time in which to file briefs answering the partial cross-exceptions and briefs submitted by Local 31 and Local 11 ("Locals"); CNN does not request an enlargement of the 50-page limit

established in the Rules and Regulations for each of those briefs. In support of this request, CNN states as follows:

1. In orders dated March 3, 2009 and March 18, 2009, the Associate Executive Secretary, Henry S. Breiteneicher, granted the General Counsel a 44-day extension until April 2, 2009 to file cross-exceptions to Judge Amchan's decision and permission to file a supporting brief of 100 letter-sized, double-spaced pages as well as appendices "in a single-spaced table format of no more than 30 pages on 11-by-14 inch paper."<sup>1</sup> In his March 18, 2009 Order, the Associate Executive Secretary also denied, as premature, CNN's March 4, 2009 request for an extension of time in which to file a brief of no more than 100 double-spaced pages on letter-sized paper. He invited CNN to renew its proposal once the General Counsel's cross-exceptions had been filed. On April 1, 2009, the General Counsel filed and served, by regular mail, its 48 cross-exceptions, an 86-page brief in support, and 24 pages of appendices.<sup>2</sup> The same day, Local 31 filed partial cross-exceptions along with a 29-page brief. Local 11 filed a statement joining in Local 31's submission.<sup>3</sup>

2. CNN proposes that the Board allow it the same 44-day extension of time to file a brief in response to the General Counsel's cross-exceptions that the Board allowed the General Counsel for filing its cross-exceptions. Forty-four days after April 2, 2009 is Saturday, May 16, 2009. CNN suggests that it be allowed to file an answering brief the next business day, Monday,

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<sup>1</sup> In addition, the General Counsel received an extension of time to file a 225-page brief on or before May 18, 2009 answering CNN's exceptions and 90 pages of appendices.

<sup>2</sup> CNN obtained a copy of the General Counsel's cross-exceptions, brief, and appendices from the Board on April 3, 2009. CNN received its service copy by mail on April 6, 2009.

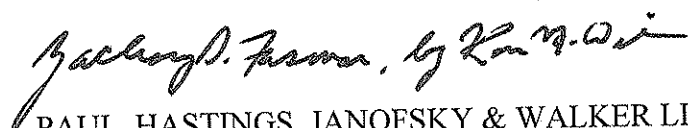
<sup>3</sup> CNN received its service copy of the Locals' partial cross exceptions and brief on April 2, 2009.

May 18, 2009.<sup>4</sup> In addition, CNN also requests that its answering brief be limited to no more than 100 letter-sized, double-spaced pages and that it be allowed to submit 30 single-spaced pages of appendices on 11-by-14 inch paper, or the equivalent (39 single-spaced 8.5-by-14 pages). This would give CNN the same number of pages for briefing and appendices as allotted to the General Counsel, consistent with the Board's Rules and the prior decisions of the Associate Executive Secretary. *See* NLRB Rules and Regulations §§ 102.46(j) and 102.114(d).

3. In his March 18, 2009 order, the Associate Executive Secretary noted that the General Counsel has stated that he does not oppose CNN's requests in this regard.

4. Finally, CNN requests the same extension of time (until May 18, 2009) in which to file a brief in response to the Locals' cross-exceptions that the Locals were allotted to file their cross-exceptions and supporting briefs. *See supra* ¶ 2. CNN does not seek an enlargement of the 50-page limit set forth in the Board Rules and Regulations for its briefs in response to the Local's submissions. *See* NLRB Rules and Regulations §§ 102.46(f)(1), (j).

Respectfully Submitted,

  
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<sup>4</sup> Pursuant to the Rules and Regulations, the General Counsel's reply would then be due on or before June 1, 2009. NLRB Rules and Regulations §§ 102.46(h).

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LOCAL 11, AFL-CIO

**AFFIDAVIT OF SERVICE**

Eric Engberg, being duly sworn, deposes and says as follows:

1. I am over 18 years of age, am not a party to this proceeding, and am employed by the law firm of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, N.W., Washington, D.C. 20005.

2. On the 7th day of April, 2009, I filed, by E-file, CNN America, Inc's Renewed Request For Extension Of Time To File A Brief In Response To Cross-Exceptions And For An Enlargement Of The Page Limit, with Henry S. Breiteneicher, Associate Executive Secretary, National Labor Relations Board, 1099 14th Street, N.W., Washington, D.C. 20570.

3. On the 7th day of April, 2009, I served one true and correct copy of CNN America, Inc's Renewed Request For Extension Of Time To File A Brief In Response To Cross-Exceptions And For An Enlargement Of The Page Limit, by e- mail, on the following:

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4. On the 7th day of April, 2009, I served one true and correct copy of CNN America, Inc's Renewed Request For Extension Of Time To File A Brief In Response To Cross-Exceptions And For An Enlargement Of The Page Limit, by overnight delivery on the following and notified the same by telephone at the numbers below:

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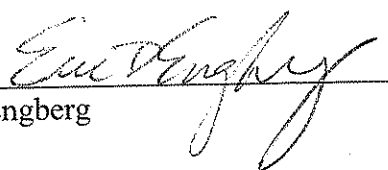
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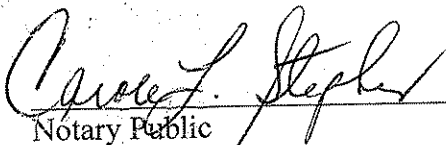
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Eric Engberg

Sworn to before me this  
7th day of April, 2009

  
Notary Public

Carole L. Stephens  
Notary Public, District of Columbia  
My Commission Expires 2-14-2010

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